IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JUSTINE MOORE, :

Plaintiff,

:

v. : CASE NO.

TRUEACCORD CORP,

:

Defendant.

:

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant TrueAccord Corp. hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Lackawanna County, Pennsylvania and in support thereof avers as follows:

- 1. TrueAccord Corp. is the defendant in a civil action originally filed on April 5, 2021 in the Court of Common Pleas of Lackawanna County, Pennsylvania titled *Justine Moore v. TrueAccord Corp.* and docketed to Case No. 21-cv-1506.
- 2. This removal is timely under 28 U.S.C. § 1446(b). TrueAccord received service of Plaintiff's Complaint by certified mail on April 16, 2021.
- 3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against TrueAccord alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

5. On this date, TrueAccord has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Lackawanna County, Pennsylvania.

WHEREFORE, Defendant TrueAccord Corp. respectfully removes this case to the United States District for the Middle District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
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Counsel for Defendant

Dated: May 17, 2021

CERTIFICATE OF SERVICE

I certify that on May 17, 2021, a true copy of the foregoing document was served as follows:

<u>Via E-mail and U.S. Mail, Postage</u>
<u>Prepaid</u>
Brett M. Freeman
Sabatini Freeman, LLC
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Counsel for Plaintiff

Via Electronic Filing
Court of Common Pleas
Lackawanna County
200 N. Washington Ave.
Scranton, PA 18503

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Dated: May 17, 2021